

UNITED STATES BANKRUPTCY COURT
DISTRICT OF VERMONT

In re:

Chapter 11

Roman Catholic Diocese of Burlington, Vermont¹,

Debtor.

Case No. 24-10205-HZC

**SECOND MONTHLY FEE STATEMENT OF PACHULSKI STANG ZIEHL & JONES
LLP, COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR THE PERIOD FEBRUARY 1, 2025 THROUGH FEBRUARY 28, 2025**

Pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees*, entered on January 29, 2025 [Dkt. No. 180] (the “Interim Compensation Order”), Pachulski Stang Ziehl & Jones LLP (“PSZJ”), attorneys for the Official Committee of Unsecured Creditors (the “Committee”) of the Roman Catholic Diocese of Burlington, Vermont, the above-captioned debtor and debtor in possession (the “Diocese”), hereby submits this monthly fee statement (the “Monthly Statement”) seeking compensation for reasonable and necessary services from February 1, 2025 to February 28, 2025 (the “Compensation Period”) in the amount of \$28,528.00 (80% of \$35,660.00) and reimbursement of actual and necessary expenses incurred during the Compensation Period in the amount of \$819.02 (100% of expenses). PSZJ reserves the right to apply in the future for reimbursement of actual and necessary costs and expenses, if any, incurred

¹ In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Diocese’s address is 55 Joy Drive, South Burlington, Vermont 05403, and its Employer Identification Number (EIN) is 03-0180730.

by members of the Committee in connection with their service as members of the Committee during the Compensation Period.

PSZJ's invoice for the Compensation Period, attached hereto as **Exhibit A**, shows the individuals who provided services during the Compensation Period and their respective titles; their respective billing rates; the aggregate hours spent by each individual; a reasonably detailed breakdown of the expenses incurred (if any); and contemporaneously maintained time entries for each individual in increments of tenths (1/10) of an hour or less.

Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the undersigned counsel for the Committee and all persons identified below, by **April 14, 2025 at 4:00 p.m.** (the "Objection Deadline"), setting forth the nature of the objection, and the amount of fees or expenses at issue. If no objection is filed, PSZJ will file a certificate of no objection with the Court, and the Diocese will be authorized to pay PSZJ the amounts set forth in this Monthly Statement.

Also pursuant to the Interim Compensation Order, the Monthly Statement will be served upon the following: (i) (*via email*) Lorei Dawson, CFO of the Debtor (ldawson@vermontcatholic.org); (ii) (*via email*) counsel for the Diocese, Fredrikson & Byron, P.A., Attn: Steven R. Kinsella, Esq.; skinsella@fredlaw.com; (iii) (*via email*) local counsel for the Diocese, Obuchowski Law Office, Attn: Ray Obuchowski, Esq.: ray@oeblaw.com; (iv) (*via*

[remainder of page left intentionally blank]

email) the Office of the UST, Attn: Lisa Penpraze, Esq.: Lisa.Penpraze@usdoj.gov; and (v) (*via email*) local counsel for the Committee, Lemery Greisler LLC, Attn: Paul A. Levine, Esq.: plevine@lemerygreisler.com.

Date: March 31, 2025

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Brittany M. Michael

Brittany M. Michael (admitted *pro hac vice*)

Gail S. Greenwood (admitted *pro hac vice*)

780 Third Avenue, 34th Floor

New York, NY 10017

Telephone: (212) 561-7700

Email: bmichael@pszjlaw.com

ggreenwood@pszjlaw.com

*Counsel to the Official Committee of Unsecured
Creditors*

EXHIBIT A



PACHULSKI
STANG
ZIEHL &
JONES

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

February 28, 2025

Invoice 145790

Client 18506.00002

Diocese of Vermont O.C.C.

-

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 02/28/2025

FEES	\$35,660.00
EXPENSES	\$819.02
TOTAL CURRENT CHARGES	\$36,479.02
BALANCE FORWARD	\$209,688.88
TOTAL BALANCE DUE	\$246,167.90

Pachulski Stang Ziehl & Jones LLP
Diocese of Vermont O.C.C.
Client 18506.00002

Page: 2
Invoice 145790
February 28, 2025

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BMM	Michael, Brittany Mitchell	Partner	950.00	5.30	\$5,035.00
JIS	Stang, James I.	Partner	950.00	0.20	\$190.00
GNB	Brown, Gillian N.	Counsel	950.00	3.10	\$2,945.00
GSG	Greenwood, Gail S.	Counsel	950.00	18.80	\$17,860.00
BDD	Dassa, Beth D.	Paralegal	625.00	11.60	\$7,250.00
HRD	Daniels, Hope R.	Paralegal	595.00	0.20	\$119.00
NJH	Hall, Nathan J.	Paralegal	595.00	3.80	\$2,261.00
			<hr/> 43.00		<hr/> \$35,660.00

Pachulski Stang Ziehl & Jones LLP
Diocese of Vermont O.C.C.
Client 18506.00002

Page: 3
Invoice 145790
February 28, 2025

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis and Recovery	4.40	\$4,180.00
BL	Bankruptcy Litigation	0.80	\$547.00
CA	Case Administration	3.50	\$2,189.00
CP	PSZJ Compensation	14.20	\$9,714.00
CPO	Other Professional Compensation	0.70	\$600.00
EB	Employee Benefits/Pensions and KEIP/KERP	18.40	\$17,480.00
GC	General Creditors' Committee	1.00	\$950.00
		<hr/> 43.00	<hr/> \$35,660.00

Pachulski Stang Ziehl & Jones LLP
Diocese of Vermont O.C.C.
Client 18506.00002

Page: 4
Invoice 145790
February 28, 2025

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Lexis/Nexis- Legal Research	\$486.22
Litigation Support Vendors	\$250.00
Pacer - Court Research	\$82.80
	<hr/>
	\$819.02

Pachulski Stang Ziehl & Jones LLP
Diocese of Vermont O.C.C.
Client 18506.00002

Page: 5
Invoice 145790
February 28, 2025

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis and Recovery						
02/03/2025	BMM	AA	Revise Rule 2004 requests with BRG's edits.	0.30	950.00	\$285.00
02/20/2025	BMM	AA	Call with G. Greenwood and BRG regarding priority discovery requests.	0.50	950.00	\$475.00
02/20/2025	GSG	AA	Conference with M. Babcock, C. Tergevorkian, and B. Michael re document analysis.	0.50	950.00	\$475.00
02/20/2025	GSG	AA	Review/revise Rule 2004 document requests re phased production.	0.40	950.00	\$380.00
02/21/2025	GSG	AA	Revise Rule 2004 motion re phasing, documents.	0.90	950.00	\$855.00
02/25/2025	BMM	AA	Revise Rule 2004 motion exhibit.	1.00	950.00	\$950.00
02/25/2025	BMM	AA	Analyze school lunch payments, other Rice bank account issues.	0.70	950.00	\$665.00
02/26/2025	GSG	AA	Review emails to/from local counsel and revised Rule 2004 document requests.	0.10	950.00	\$95.00
				4.40		\$4,180.00
Bankruptcy Litigation						
02/03/2025	NJH	BL	Upload onto Everlaw documents received from the Assistant United States Trustee for analysis by attorneys.	0.30	595.00	\$178.50
02/10/2025	NJH	BL	Upload VFFC annual reports onto Everlaw for analysis by attorneys.	0.30	595.00	\$178.50
02/13/2025	JIS	BL	Call with B. Michael regarding case status.	0.10	950.00	\$95.00
02/28/2025	JIS	BL	Status call with PSZJ.	0.10	950.00	\$95.00
				0.80		\$547.00
Case Administration						
02/03/2025	NJH	CA	Draft critical dates memorandum.	0.90	595.00	\$535.50
02/04/2025	NJH	CA	Revise critical dates memorandum.	0.10	595.00	\$59.50
02/10/2025	NJH	CA	Draft critical dates memorandum.	1.10	595.00	\$654.50
02/14/2025	NJH	CA	Draft critical dates memorandum.	0.30	595.00	\$178.50

Pachulski Stang Ziehl & Jones LLP
Diocese of Vermont O.C.C.
Client 18506.00002

Page: 6
Invoice 145790
February 28, 2025

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/20/2025	BMM	CA	Call with Debtor's counsel regarding ongoing case issues.	0.30	950.00	\$285.00
02/24/2025	NJH	CA	Draft critical dates memorandum.	0.40	595.00	\$238.00
02/28/2025	NJH	CA	Revise critical dates memorandum.	0.40	595.00	\$238.00
				3.50		\$2,189.00

PSZJ Compensation

02/03/2025	BDD	CP	Email Accounting re PSZJ 1st interim fee application.	0.10	625.00	\$62.50
02/03/2025	BDD	CP	Begin drafting PSZJ's 1st interim fee application.	3.20	625.00	\$2,000.00
02/03/2025	GNB	CP	Calls with B. Dassa regarding interim fee application (.1); email with B. Dassa regarding interim compensation procedures and brief review of interim compensation order (.1).	0.20	950.00	\$190.00
02/04/2025	BDD	CP	Email B. Michael re PSZJ 1st interim fee application.	0.10	625.00	\$62.50
02/04/2025	BDD	CP	Continue drafting PSZJ's 1st interim fee application (4.70) and email G. Brown re same (.10).	4.80	625.00	\$3,000.00
02/04/2025	GNB	CP	Email with C. Curts regarding revision to LEDES file for November 2024 bill.	0.10	950.00	\$95.00
02/04/2025	GNB	CP	Email PSZJ team regarding interim and monthly fee issues, LEDES files, and Committee communications regarding fees.	0.10	950.00	\$95.00
02/05/2025	BDD	CP	Continue drafting PSZJ 1st interim fee application (2.8) and emails to (.2) and calls with G. Brown re same (.1).	3.10	625.00	\$1,937.50
02/05/2025	GNB	CP	Email with B. Michael regarding PSZJ first interim fee application; email with L. Penpraze regarding PSZJ LEDES files for first interim fee period.	0.10	950.00	\$95.00
02/05/2025	GNB	CP	Email with B. Michael regarding fee applications, notice of same, service by Stretto.	0.10	950.00	\$95.00
02/05/2025	GNB	CP	Call with B. Dassa regarding edits to PSZJ first interim fee application.	0.10	950.00	\$95.00

Pachulski Stang Ziehl & Jones LLP
Diocese of Vermont O.C.C.
Client 18506.00002

Page: 7
Invoice 145790
February 28, 2025

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/05/2025	GNB	CP	Email with PSZJ team regarding compensation issues, Debtor's notice of hearing suggestions (.2); review interim compensation order in connection with same (.2).	0.40	950.00	\$380.00
02/06/2025	BDD	CP	Email G. Brown re PSZJ 1st interim fee application.	0.10	625.00	\$62.50
02/06/2025	GNB	CP	Email with Committee Chair regarding approval of PSZJ first interim fee application; email with P. Levine regarding same.	0.10	950.00	\$95.00
02/06/2025	GNB	CP	Finalize PSZJ first interim fee application.	0.80	950.00	\$760.00
02/07/2025	GNB	CP	Provide edits to Debtor's omnibus notice of hearing on first interim fee application (.15); email with P. Levine regarding hearing date (.05).	0.20	950.00	\$190.00
02/11/2025	GNB	CP	Email with H. Daniels regarding monthly fee statements; email with BRG regarding same.	0.10	950.00	\$95.00
02/12/2025	GNB	CP	Review H. Daniels' draft template for monthly fee statements along with applicable LBRs, interim compensation order.	0.20	950.00	\$190.00
02/23/2025	GNB	CP	Email with LG regarding monthly fee statement template; revise monthly fee statement.	0.10	950.00	\$95.00
02/26/2025	HRD	CP	Finalize PSZJ January monthly fee statement.	0.20	595.00	\$119.00
				14.20		\$9,714.00

Other Professional Compensation

02/04/2025	GNB	CPO	Email with LG regarding interim fee applications and monthly fee statements for all Committee professionals.	0.10	950.00	\$95.00
02/05/2025	BDD	CPO	Review interim compensation procedures order (.10) and email G. Brown re same (.10).	0.20	625.00	\$125.00
02/06/2025	GNB	CPO	Email BRG regarding monthly and interim fee applications.	0.10	950.00	\$95.00
02/14/2025	GNB	CPO	Revise monthly fee statement template.	0.10	950.00	\$95.00
02/21/2025	GNB	CPO	Email with M. Kuhn regarding monthly fee application; email LG regarding same.	0.10	950.00	\$95.00

Pachulski Stang Ziehl & Jones LLP
Diocese of Vermont O.C.C.
Client 18506.00002

Page: 8
Invoice 145790
February 28, 2025

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/23/2025	GNB	CPO	Email LG and BRG regarding monthly fee statements.	0.10	950.00	\$95.00
				0.70		\$600.00

Employee Benefits/Pensions and KEIP/KERP

02/24/2025	GSG	EB	Review Debtor's brief re pension benefits, governing portions of benefit plan.	0.90	950.00	\$855.00
02/24/2025	GSG	EB	Research cases re 363 benefits and standards re ordinary course and business judgment, and notes re same.	3.10	950.00	\$2,945.00
02/24/2025	GSG	EB	Review pleadings re benefit motion, procedural posture.	1.10	950.00	\$1,045.00
02/25/2025	GSG	EB	Draft objection to accused priest pension payments.	8.10	950.00	\$7,695.00
02/26/2025	GSG	EB	Brief research re retiree benefits under the Bankruptcy Code.	0.60	950.00	\$570.00
02/26/2025	GSG	EB	Draft/revise objection to wage order/priest benefits.	2.90	950.00	\$2,755.00
02/26/2025	GSG	EB	Email B. Michael re objection to priest benefits and open issues.	0.20	950.00	\$190.00
02/28/2025	BMM	EB	Analyze Debtor's brief on retirement benefits (.4) and draft response (1.1).	1.50	950.00	\$1,425.00
				18.40		\$17,480.00

General Creditors' Committee

02/10/2025	BMM	GC	Call with SCC regarding ongoing case issues.	0.50	950.00	\$475.00
02/23/2025	BMM	GC	Respond to state court counsel questions regarding claims form.	0.10	950.00	\$95.00
02/24/2025	BMM	GC	Draft email to Committee regarding case update.	0.40	950.00	\$380.00
				1.00		\$950.00

TOTAL SERVICES FOR THIS MATTER:

\$35,660.00

Pachulski Stang Ziehl & Jones LLP
Diocese of Vermont O.C.C.
Client 18506.00002

Page: 9
Invoice 145790
February 28, 2025

Expenses

01/29/2025	LN	18506.00002 Lexis Charges for 01-29-25	1.53
01/29/2025	LN	18506.00002 Lexis Charges for 01-29-25	68.91
01/29/2025	LN	18506.00002 Lexis Charges for 01-29-25	16.84
01/29/2025	LN	18506.00002 Lexis Charges for 01-29-25	194.92
02/11/2025	LN	18506.00002 Lexis Charges for 02-11-25	1.70
02/11/2025	LN	18506.00002 Lexis Charges for 02-11-25	10.19
02/11/2025	LN	18506.00002 Lexis Charges for 02-11-25	3.40
02/11/2025	LN	18506.00002 Lexis Charges for 02-11-25	72.06
02/12/2025	LN	18506.00002 Lexis Charges for 02-12-25	8.49
02/12/2025	LN	18506.00002 Lexis Charges for 02-12-25	1.70
02/12/2025	LN	18506.00002 Lexis Charges for 02-12-25	72.06
02/13/2025	LN	18506.00002 Lexis Charges for 02-13-25	11.89
02/25/2025	LN	18506.00002 Lexis Charges for 02-25-25	22.53
02/28/2025	OS	Everlaw, Inv. 144213	250.00
02/28/2025	PAC	Pacer - Court Research	82.80

Total Expenses for this Matter

\$819.02